

January 1, 2003

COMMENT

In re: RM-10620 Petition for Rules Change

With regard to Mr. Dale Reich's petition for a rules change in the Amateur Radio Service, I am writing to say that I **OPPOSE** his petition.

It appears that many would like to accelerate amateur radio's trek down the slippery slope with regard to handouts. I personally find that the petitioner's arguments for justifying this change to be summarily without merit.

Novice class licensees MAY operate in the VHF spectrum, as requested by the petitioner. True or not, the petitioner points out that the Novice test taken years ago was much more difficult than contemporary tests. Thus, the ability to take and pass a Technician license exam should be very easy for those operators desiring VHF privileges.

Assuming that the Commission were to upgrade Novice class licensees to Technicians, there would then be two classes of Technician licensees: one with HF and VHF privileges, and one with VHF privileges. I submit that it takes little conjecture to foresee another petition, submitted in the name of "equality" to give the current Codeless Technician licensees HF privileges. Where will this stop?!

The petitioner cites that, "*In real emergencies the Novices need voice communications on VHF in 2 meters and 6 meters like in the past.*" Contrary to Mr. Reich's assertions, emergencies are not necessarily handled on those bands. In addition, these Novice class licensees in question MAY operate in these bands with a control operator present who is of the appropriate license class. Surely, emergencies of the type that the petitioner mentions would include amateur licensees of other classes. Finally, Commission rules already provide some regulatory relief for emergencies.

The petitioner mentions criteria for upgrading licenses to be centered on twenty or more years of experience as a Novice class licensee. I would point out to the Commission that "years of licensure" is not necessarily commensurate with "years of experience." Does it not stand to reason that most Novice class licensees who have such "experience" going back twenty years would already have taken the initiative to upgrade to Amateur General?

The petitioner further states that his "twenty-plus" rule might be dumbed down, should the applicant have experience with MARS, CAP, FEMA, or USCGA. How can we equate the operation of a VHF marine radio with amateur radio? This flies in the face of the petitioner's earlier argument of "years of operation as a Novice class licensee." Why does he not include some of the more obvious radio services in his proposal, such as CB or FRS?

Mr. Reich wants amateur radio to fall into the category of another government entitlement similar to Social Security – available at age 62. Certainly this would not bode well with the poor who, while younger, still receive handouts from the government.

While my entry into amateur radio was not until after the CW requirement was lowered, I have otherwise received my licenses by earning them. Likewise, I have an eleven year-old daughter who is a Technician class licensee and a thirteen year-old son who is Amateur Extra. Please don't negate what they have worked so hard for.

I ask that you **DISMISS** RM-10620 with prejudice.

Sincerely,

John P. Slater, Jr.
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